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Attorneys for Plaintiff
COREPHOTONICS, LTD.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

COREPHOTONICS, LTD.

Case No. 3:17-cv-06457-JD (Lead)
Case No. 5:18-cv-02555-JD

VS.

VS.

VS.

APPLE INC.

Defendant

**PLAINTIFF COREPHOTONICS, LTD.'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL:**

- (1) PORTIONS OF ITS OPPOSITION TO APPLE INC.'S MOTION TO DISMISS FOR LACK OF STANDING; and
- (2) PORTIONS OF DECLARATION OF ERAN KALI IN SUPPORT OF COREPHOTONICS, LTD.'S RESPONSE IN OPPOSITION TO APPLE INC.'S MOTION TO DISMISS FOR LACK OF STANDING.

1 In accordance with Civil L.R. 7-11 and 79-5, Plaintiff Corephotonics, Ltd.
2 (“Corephotonics”) respectfully seeks a narrowly-tailored Order authorizing the sealing of portions
3 of its concurrently filed Opposition to Apple, Inc.’s Motion to Amend Answer and supporting
4 declaration, namely:

5 1. Highlighted portions of Corephotonics’ Opposition to Apple Inc.’s Motion to
6 Dismiss for Lack of Standing; and
7 2. Highlighted portions of Declaration of Eran Kali in Support of Corephotonics’
8 Opposition to Apple Inc.’s Motion to Dismiss for Lack of Standing.

9 As set forth in the accompanying Declaration of Brian Ledahl, the highlighted material in
10 Items 1-3 includes confidential information relating to Corephotonics’ patent licensing activity
11 and confidential corporate transactions. Compelling reasons and good cause exist to permit
12 Corephotonics to file that information under seal, as the public disclosure of that information
13 would pose irreparable harm not only to Corephotonics but also potentially to third parties
14 involved in Corephotonics’ licensing activity.

15 Corephotonics has reviewed and complied with the Court’s Standing Order Governing
16 Administrative Motions to File Materials Under Seal and Civil Local Rule 79-5.

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For the reasons set forth above, Corephotonics respectfully requests that the Court grant an Order allowing Corephotonics to file the highlighted portions of the above documents under seal.

DATED: January 15, 2024

Respectfully submitted,

RUSS AUGUST & KABAT

By: /s/ Brian D. Ledahl

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CERTIFICATE OF SERVICE

I certify that counsel of record who are deemed to have consented to electronic service are being served on January 15, 2024, with a copy of this document via the Court's CM/ECF systems per Local Rule CV-5(a)(3). Any other counsel will be served by electronic mail, facsimile, overnight delivery and/or First Class Mail on this date.

/s/Marc Fenster

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